

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE SCHERING-PLOUGH
CORPORATION / ENHANCE
SECURITIES LITIGATION

Civil Action No. 08-397 (DMC) (JAD)

**SUPPLEMENTAL MEMORANDUM OF LAW IN FURTHER SUPPORT
OF CO-LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS'
FEEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

Salvatore J. Graziano
Adam H. Wierzbowski
Laura H. Gundersheim
1285 Avenue of the Americas
New York, NY 10019
Tel: (212) 554-1400
Fax: (212) 554-1444

LABATON SUCHAROW LLP

Jonathan M. Plasse
Christopher J. McDonald
Stephen W. Tountas
140 Broadway
New York, NY 10005
Tel: (212) 907-0700
Fax: (212) 818-0477

Lead Plaintiffs respectfully submit this Supplemental Memorandum of Law and the attached Declaration of Kahn Swick & Foti, LLC (the “Kahn Declaration”) (Ex. A attached hereto) in further support of Co-Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (“Fee Motion”).

In connection with Co-Lead Counsel’s Fee Motion filed with the Court on July 2, 2013 (ECF No. 424), Co-Lead Counsel inadvertently omitted to attach the Kahn Declaration. As set forth in the Kahn Declaration, partners and an associate at Kahn Swick & Foti, LLC were actively involved in Plaintiffs’ Counsel’s review and analysis of the more than 12 million pages of documents produced by Defendants in the litigation. Ex. A.

The Kahn Declaration does not alter in any way Co-Lead Counsel’s request that the Court award attorneys’ fees of 16.92% of the Settlement Fund, reimbursement of litigation expenses in the amount of \$3,620,049.63, or reimbursement of Lead Plaintiffs’ expenses in the amount of \$102,447.26.

CONCLUSION

For the reasons set forth above and in Co-Lead Counsel’s Memorandum of Law in Support of Co-Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses, Co-Lead Counsel respectfully request that this Court award attorneys’ fees of 16.92% of the Settlement Fund,

reimbursement of litigation expenses in the amount of \$3,620,049.63, and reimbursement of Lead Plaintiffs' expenses in the amount of \$102,447.26.

Dated: July 12, 2013

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

Liaison Counsel for the Class

BY: /s/ James E. Cecchi

JAMES E. CECCHI

Salvatore J. Graziano
Adam H. Wierzbowski
Laura H. Gundersheim
BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP
1285 Avenue of the Americas
New York, New York 10019
(212) 554-1400

*Counsel for Lead Plaintiffs Arkansas
Teacher Retirement System, Public
Employees' Retirement System of
Mississippi, Louisiana Municipal Police
Employees' Retirement System and Co-
Lead Counsel for the Class*

Jonathan M. Plasse
Christopher J. McDonald
Stephen W. Tountas
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0700

*Counsel for Lead Plaintiff Massachusetts
Pension Reserves Investment Management
Board and Co-Lead Counsel for the Class*